

HILDEBRAND, McLEOD & NELSON, INC.  
ATTORNEYS AT LAW  
WESTLAKE BUILDING  
350 FRANK H. OGATA PLAZA FOURTH FLOOR  
OAKLAND, CALIFORNIA 94612-2006  
(510) 461-6732

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

JOSHUA RUND,	)	CASE NO. 6:19-cv-00865-MC
	)	
Plaintiff,	)	<b>JOINT STIPULATION FOR</b>
	)	<b>DISMISSAL WITH PREJUDICE</b>
vs.	)	<b>AND [PROPOSED] ORDER</b>
	)	
ALBANY & EASTERN RAILROAD	)	Complaint Filed: June 4, 2019
COMPANY, a domestic business	)	
corporation;	)	
	)	
Defendant.	)	
	)	

The parties to this action, acting through their respective counsel and pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii) hereby stipulate, in consideration of a negotiated settlement executed by them, to the Dismissal with Prejudice of this action, including all claims stated herein against Defendant, with each party to bear their own costs and attorney's fees.

DATED: December 28, 2020 HILDEBRAND, McLEOD & NELSON, LLP

*/s/ Carole M. Bosch*  
By: CAROLE M. BOSCH, OSB 190837  
Attorneys for Plaintiff

1 DATED: July 28, 2020

SMITH FREED EBERHARD

2 */s/ Ryan J. McLellan*  
 3 By: RYAN J. MCLELLAN, OSB 023908  
 4 SEAN K. CONNER, OSB 132518  
 Attorneys for Defendant

5  
6 **ORDER**

7 Pursuant to the above stipulation of the parties, the entire action, including all claims  
 8 stated herein against Defendant, is hereby dismissed with prejudice.  
 9

10 ENTERED this 4th day of January 2021.  
 11 ~~2020~~

12 s/Michael J. McShane  
 13 The Honorable Michael J. McShane  
 14 U.S. District Court for the District of Oregon  
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